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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Valentino Dimitrov, individually, and on
behalf of all others similarly situated;

Plaintiffs,

vs.

Stavatti Aerospace, Ltd, a Minnesota
corporation; Stavatti Aerospace, Ltd, a
Wyoming corporation; Stavatti
Corporation, a Minnesota corporation;
Stavatti Immobiliare, Ltd, a Wyoming
corporation; Stavatti Industries, Ltd, a
Wyoming corporation; Stavatti Niagara,
Ltd, a New York corporation Stavatti
Super Fulcrum, Ltd, a Wyoming
corporation; Stavatti Ukraine, a Ukrainian
business entity; Stavatti Heavy Industries
Ltd, a Hawaii corporation; Christopher
Beskar and Maja Beskar, husband and
wife; John Simon and Jean Simon,
husband and wife; William Mcewn and
Patricia Mcewen, husband wife; Rudy
Chacon and Jane Doe Chacon, husband
and wife; and DOES 1 through 10,
inclusive,

Defendants.

Case No.: CV-23-00226-PHX-DJH

**DECLARATION OF PLAINTIFF
VALENTINO DIMITROV IN SUPPORT
OF MOTION FOR ENTRY OF
DEFAULT JUDGMENT AGAINST
DEFENDANTS STAVATTI
AEROSPACE, LTD, A WYOMING
CORPORATION; STAVATTI
IMMOBILIARE, LTD, A WYOMING
CORPORATION; STAVATTI
INDUSTRIES, LTD, A WYOMING
CORPORATION; STAVATTI SUPER
FULCRUM LTD, A WYOMING
CORPORATION; STAVATTI HEAVY
INDUSTRIES LTD, A HAWAII
CORPORATION; STAVATTI
NIAGARA LTD, A NEW YORK
CORPORATION; AND JOHN SIMON**

I, Valentino Dimitrov, declare under penalty of perjury that the following is true

1 and correct:

2 1. I am the Plaintiff in this matter.

3 2. All statements in the Complaint are true.

4 3. All exhibits attached to the Complaint are accurate.

5 4. I am a hard-working individual who invests and loans money to businesses.

6 5. In February of 2022, I loaned Defendant Stavatti Aerospace Ltd \$1,000,000
7 based on false representations and assertions the Defendants in this case intended for me
8 to rely on. It's my understanding that Defendant Stavatti Aerospace Ltd is a Ponzi scheme
9 and all of the named Defendants are either "subsidiaries" of Stavatti Aerospace Ltd or
10 "executives" of a Stavatti Aerospace Ltd "subsidiary." Upon information and belief, the
11 Defendants listed in this action worked in concert to defraud me. They created fake
12 marketing materials and fake revenue projections. The Defendants unfortunately
13 succeeded in defrauding me. I loaned them \$1,000,000 based on their false representations
14 that they would return my \$1,000,000 as well as my \$5,000,000 in profit distributions.
15 Defendants worked hard to trick me into loaning them money as if the money was to be
16 used in a real revenue generating enterprise.

17 6. None of the named Defendants have returned any of the money I loaned to
18 them.

19 7. I am damaged, at least, in the amount of \$6,000,000.


20 8. I understand that all of the Defendants I am motioning for default against
21 have notice of this lawsuit and have either chosen not to answer or have failed to answer
22 by the deadline provided by the Federal Rules of Civil Procedure.

23 9. I respectfully ask that you hold Stavatti Aerospace Ltd, a Wyoming
24 corporation; Stavatti Immobiliare LTD, a Wyoming corporation; Stavatti Industries, LTD,
25 a Wyoming corporation; Stavatti Super Fulcrum LTD, a Wyoming corporation; Stavatti
26

1 Heavy Industries Ltd, A Hawaii corporation; Stavatti Niagara LTD, a New York
2 corporation, and John Simon jointly and severally liable for the \$6,000,000 in damages I
3 have suffered.
4

5 EXECUTED this 5th day of April, 2023.
6

7 **ENARA LAW, PLLC**

8 By: /s/ 
9 Valentino Dimitrov
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Audit trail

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